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8 UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:  
15 ALL ACTIONS

~~PROPOSED~~ ORDER RE JOINT  
DISCOVERY LETTER BRIEF ON  
WHETHER YOUTUBE MUST  
PRODUCE DOCUMENTS  
REGARDING ITS CORPORATE  
STRUCTURE AND HISTORICAL  
VERSIONS OF POLICIES  
CONCERNING ITS COMPLAINT  
PROCESS (DKT. 1305)

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18 Judge: Hon. Yvonne Gonzalez Rogers  
19 Magistrate Judge: Hon. Peter H. Kang  
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Pursuant to oral argument heard during the Court's November 21, 2024 Discovery Management Conference, the Court hereby ORDERS the following regarding PI/SD Plaintiffs and Defendants YouTube, LLC and Google, LLC (together, "YouTube"), (collectively, the "Parties"), Joint Letter Brief on Whether YouTube Must Produce Documents Regarding its Corporate Structure and Historical Versions of Policies Concerning its Complaint Process (Dkt. 1305).

1) With respect to RFP No. 62:

a) As to the portion of the request that seeks crisis management policies for responding to investigations, lawsuits, and media inquiries regarding the safety of minors, including documents explicitly discussing said policies, YouTube is directed to serve a supplemental response stating that no responsive non-privileged crisis management policies exist, if accurate based on YouTube's reasonable investigation. YouTube is otherwise directed to produce non-privileged responsive policies.

i) To the extent responsive documents have already been produced, YouTube is directed to identify by production date the productions containing policies responsive to RFP No. 62.

b) As to the portion of the request which seeks documents showing the methods of communication regarding crisis management, the Parties are directed to further meet and confer.

2) With respect to RFP No. 69, YouTube is directed to serve a supplemental response stating that there are no responsive policies describing how the general compensation policies previously produced should be applied to the teams responsible for youth safety in particular, if accurate based on YouTube's reasonable investigation. YouTube is otherwise directed to produce such non-privileged responsive policies.

3) With respect to RFP Nos. 71, 72, 76 and 79, to the extent responsive policies have already been produced, YouTube is directed to identify by production date the productions containing policies responsive to RFP Nos. 71-72, 76, and 79. Plaintiffs may reasonably request historical versions of specific policies produced in response to these requests and

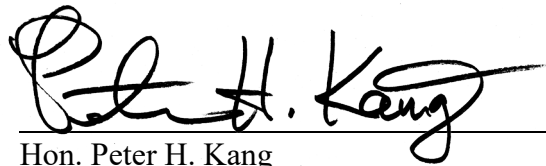
1 for which such historical versions are relevant and proportional to the needs of the case.

2 The parties are directed to meet and confer in response to any such reasonable request.

- 3 4) As to each request, to the extent YouTube withholds any responsive document on the basis  
4 of any claim of privilege, YouTube must log those documents in accordance with the  
5 Privilege Log Protocol (Dkt. No. 740).

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7 **IT IS SO ORDERED**

8  
9 DATED: December 27, 2024



Hon. Peter H. Kang  
United States Magistrate Judge

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14 DATED: December 27, 2024

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**ATTESTATION**

I, Ellyn Hurd, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 27, 2024

By: /s/ Ellyn Hurd  
Ellyn Hurd